

**REMARKS**

Reconsideration and allowance are requested. Claims 25 - 52 are pending and claim 25 is amended. Claim 53 is cancelled. New claims 54 and 55 are added. No new matter is added.

Applicants thank the Examiner for the interview on January 4, 2006 and have adopted in the amended claim 25 above and new claims 54 and 55 the language suggested by the Examiner.

**Rejection of Claims 25 - 53 Under Section 101**

The Examiner rejects claims 25 - 53 under Section 101 because the claimed invention is directed to non-statutory subject matter. Claim 25 is amended to recite a computer-implemented method. Accordingly, Applicants request withdrawal of this rejection. Furthermore, computer-readable and a computer hardware claim are added as well per the Examiner's suggestion.

**Rejection of Claims 25-53 Under Section 103(a)**

Claims 25-53 are rejected under Section 103(a) as being unpatentable over Suzan et al. MPEG-7 Standardization Activities ("Suzan et al.") in view of U.S. Patent No. 6,564,263 to Bergman et al. ("Bergman et al."). Applicants have amended claim 25 to recite the step of generating, from the multimedia object descriptions, non-hierarchical entity relation graph descriptions for at least one of the multimedia types. The non-hierarchical entity relation graph descriptions are associated with communication between multimedia objects. As discussed in the telephone interview, this limitation distinguishes a non-hierarchical relationship (as discussed on page 20 where A is talking to B or communicating with B) with a hierarchical relationship.

Accordingly, Applicants respectfully submit that claim 25 is now patentable over the prior art of record. Therefore, claims 26 – 52 that depend from claim 25 are patentable as well.

New claims 54 and 55 include similar limitations to the limitation discussed relative to claim 25 and are also patentable for the same reasons.

### CONCLUSION

In view of the above, Applicants submit that all claims are patentable over the prior art of record and respectfully request that the Examiner's rejections of these claims be withdrawn.

Respectfully submitted,

Date: January 4, 2006

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